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November 9, 2023

**BY ECF**

Hon. Alvin K. Hellerstein  
Southern District of New York  
United States Courthouse  
Courtroom 14D  
500 Pearl Street  
New York, NY 10007

*So ordered  
11-9-23  
Alvin K. Hellerstein*

Re: Gilbert v. City of New York, et al. – 23-cv-00421 (AKH)

Your Honor:

I am co-counsel for Plaintiff Andrew Gilbert. On October 26, 2023, Defendants served an Offer of Judgment pursuant to Fed.R.Civ.P. 68 in this matter. On November 8, 2023, Plaintiff accepted.

I therefore write, with consent of all defense counsel, to ask that the Court cancel the initial pretrial conference scheduled for November 17, 2023, and any other remaining deadlines.

I also write with consent from all defense counsel to ask that the Court extend the time by which Plaintiff must file any application for attorney's fees, costs, and expenses until 60 days after the Court enters judgment. If the Court grants this application, the parties will use that time to exchange information, demands, and offers, and will attempt to settle Plaintiff's claim for attorney's fees, costs, and expenses without the need for intervention from the Court, if possible.

Thank you for the Court's attention to this matter.

Respectfully submitted,

*Gideon Orion Oliver*

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